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UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF CALIFORNIA

LAVIRRISE BYNES,

Plaintiff,

v.

SOLANO COUNTY SHERIFF'S  
DETECTIVE OLMSTEAD and DOES 1-25,

Defendants.

Case No. 2:21-cv-01537-DJC-AC

**STIPULATION AND ORDER TO MODIFY  
PRETRIAL AND TRIAL DATES**

Plaintiff Lavirrise Bynes, by and through her counsel for record, Stanley Goff, and Defendant C. Olmstead, by and through their respective counsel of record, Danielle K. Lewis, hereby stipulate to modify the current pretrial and trial dates.

Counsel for the Parties have met and conferred and agree that a modification of the briefing schedule is necessary.

The parties hereby stipulate that:

The Final Pretrial Conference set for June 27, 2024 should be vacated and reset for October 24, 2024 at 1:30 p.m. in Courtroom 10 before District Judge Daniel J. Calabretta.

The Jury Trial set for August 12, 2024 should be vacated and reset for December 9, 2024 at 9:00 a.m. in Courtroom 10 before District Judge Daniel J. Calabretta.

This request is based on the following facts demonstrating good cause:

1           1.       On July 13, 2023, the Parties participated in a Status Conference. Following that  
2 Status Conference, a Final Pretrial Conference was set for March 21, 2024 and a Jury Trial was  
3 set for May 20, 2024 at 9:00 a.m. (Dkt. No. 39)

4           2.       On November 15, 2024, Defendant filed a Motion for Summary Judgment. (Dkt.  
5 No. 41) The motion has been fully briefed.

6           3.       On January 4, 2024, counsel for the Parties appeared at the hearing on  
7 Defendant's Motion for Summary Judgment. (Dkt. No. 56)

8           4.       On January 11, 2024, the Parties submitted supplemental briefing as requested by  
9 the Court. (Dkt. No. 57, 58)

10          5.       On February 9, 2024, the Court issued a Minute Order, and on the Court's own  
11 motion, the Final Pretrial Conference set for March 21, 2024 was vacated and reset for June 27,  
12 2024 at 1:30 p.m. and the Jury Trial set for May 20, 2024 was vacated and reset for August 12,  
13 2024 at 9:00 a.m. in Courtroom 10 before District Judge Daniel J. Calabretta. (Dkt. No. 59)

14          6.       With the Motion for Summary Judgment still pending, the Parties are not in a  
15 position to submit Pretrial Conference Statements, meaningfully participate in the Final Pretrial  
16 Conference, or adequately prepare for the Jury Trial.

17          7.       The Parties have proposed dates for the Final Pretrial Conference and Jury Trial,  
18 subject to the availability of the Court.

19          8.       This stipulation is being filed in good faith and not for purposes of delay.

20          9.       The Parties submit that the foregoing demonstrates good cause to grant the  
21 request in this Stipulation.

22               IT IS SO STIPULATED.

23  
24 DATED: June 10, 2024

HAWKINS PARNELL & YOUNG LLP

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26  
27 By: /s/ Danielle K. Lewis  
DANIELLE K. LEWIS  
MILES F. MAURINO  
Attorneys for Defendant  
28 C. OLMSTEAD

DATED: June 10, 2024

LAW OFFICE OF STANLEY GOFF

By: /s/ Stanley Goff  
STANLEY GOFF  
Attorneys for Plaintiff  
LAVIRISSE BYNES

**FILER'S ATTESTATION**

I hereby attest that I have been authorized by counsel to show their signature on this document as /s/.

DATED: June 10, 2024

/s/ Danielle K. Lewis

DANIELLE K. LEWIS

Hawkins Parnell & Young LLP  
ATTORNEYS AT LAW

**ORDER**

The foregoing stipulation of the parties is approved, and IT IS SO ORDERED

The Final Pretrial Conference set for June 27, 2024 is VACATED and RESET for October 24, 2024 at 1:30 p.m. before District Judge Daniel J. Calabretta.

The Jury Trial set for August 12, 2024 is VACATED and RESET for December 9, 2024 at 8:30 a.m. in Courtroom 10 before District Judge Daniel J. Calabretta.

Dated: June 12, 2024

/s/ Daniel J. Calabretta

THE HONORABLE DANIEL J. CALABRETTA  
UNITED STATES DISTRICT JUDGE

Hawkins Parnell & Young LLP  
ATTORNEYS AT LAW